

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
FORT WAYNE DIVISION

COREY PRESTON,)	Case No.
)	
Plaintiff,)	
)	
v.)	
)	
FORGE INDUSTRIAL STAFFING, INC.)	
and BERNE APPAREL COMPANY,)	
)	
Defendant.)	

PETITION FOR REMOVAL

COMES NOW Defendant, Berne Apparel Company, by counsel, pursuant to Title 28, United States Code, Section 1446, and respectfully petitions the Court as follows:

1. On November 12, 2018, an action was commenced against the Defendant, Berne Apparel Company (“Berne”), in the Allen Superior Court of the State of Indiana, entitled *Corey Preston v. Forge Industrial Staffing, Inc. and Berne Apparel Company*, Cause No: 02D09-1811-CT-000658 by the filing of a Complaint with said Court. A copy of the Complaint which was received by the Defendant, Berne, on or about November 21, 2018 is attached hereto and incorporated herein as Exhibit “A”.

2. The above-described action is a civil action of which this Court has original jurisdiction under the provisions of Title VII of the Civil Rights Act of 1964, 42 U.S.C. §2000(e) *et seq.* and is one which may be removed to this Court by the Defendant.

3. The Defendant has filed a Notice of Filing Petition for Removal contemporaneously herewith in the Allen County Superior Court.

WHEREFORE, Defendant, Berne Apparel Company, prays that the action above now pending against Defendant in the Allen Superior Court be removed therefrom to this Court forthwith, and for all other just and proper relief in the premises.

BARRETT MCNAGNY LLP

Date: December 12, 2018

By: /s/Anthony M. Stites
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CERTIFICATE OF SERVICE

I hereby certify that on the 12th day of December 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system and/or by U.S. Mail which sent notifications of such filing to the following:

Christopher C. Myers, Esq.
Christopher C. Myers & Associates
809 South Calhoun Street, Suite 400
Fort Wayne, IN 46802

Forge Industrial Staffing, Inc.
1010 W. Coliseum Blvd., Suite A
Fort Wayne, IN 46808

/s/ Anthony M. Stites
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